

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

GESTURE TECHNOLOGY PARTNERS,
LLC,

Plaintiff,

v.

LENOVO GROUP LTD.,
LENOVO (UNITED STATES) INC., and
MOTOROLA MOBILITY LLC,

Defendants.

CIVIL ACTION NO. 6:21-cv-00122

JURY TRIAL DEMANDED

**DECLARATION OF MICHAEL SIMONS IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANTS LENOVO (UNITED
STATES) INC.'S, AND MOTOROLA MOBILITY LLC'S MOTION TO
DISMISS UNDER FEDERAL RULES OF CIVIL PROCEDURE 12(B)(3)**

I, Michael Simons, state and declare as follows:

1. I am an attorney with Williams Simons & Landis PLLC and counsel to Plaintiff Gesture Technology Partners, LLC. I make this declaration in support of Plaintiff's Opposition to Defendants Lenovo (United States) Inc. and Motorola Mobility LLC's Motion to Dismiss Under Federal Rules of Civil Procedure 12(b)(3). I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of Defendant Lenovo (United States) Inc.'s Responses to Plaintiff Gesture Technology Partners, LLC's First Set of Interrogatories (Nos. 1-11), dated May 26, 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of Defendant Motorola Mobility LLC's Responses to Plaintiff Gesture Technology Partners, LLC's First Set of Interrogatories (Nos. 1-11), dated May 26, 2021.

4. Attached hereto as Exhibit 3 is a true and correct copy of Gesture_Motorola_000000001 - 3.

5. Attached hereto as Exhibit 4 is a true and correct copy of a summary and images of LinkedIn pages for 73 defendant employees that reside in the Western District of Texas.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of The Deposition of Jesal Acharya the Corporate Representative for Defendants Lenovo (United States) Inc. and Motorola Mobility LLC, taken on August 25, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Travis County, Texas on this 13th day of October, 2021.

Dated: October 13, 2021

/s/ Michael Simons
Michael Simons